



Department of Energy

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90-PPB-188

SEP 26 1990

Mr. Paul Day
Hanford Project Manager
U. S. Environmental Protection Agency
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Mr. T. L. Nord
Hanford Project Manager
State of Washington
Department of Ecology
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Mail Stop PV-11
Lacey, Washington 98503

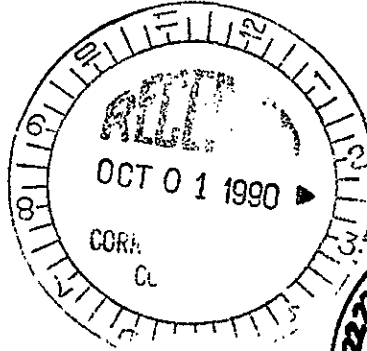
Dear Messrs. Day and Nord:

DOE-RL/WHC RCRA/DANGEROUS WASTE PERMIT ISSUES WORKING GROUP

We were pleased by the progress made at our meeting on August 29, 1990, during which we discussed general Hanford permit issues. It is our understanding from Ecology's verbal description of the proposed permit that the units not specifically identified would continue to be subject to interim status requirements, rather than permit requirements. The general permit requirements would become applicable to these units when the Part B was expanded to specifically cover these units. Until such time we assume all interim status provisions, such as interim status expansion provisions, of the regulations would continue to apply.

Because the process described essentially calls for issuance of the Part B permit on a unit by unit basis we would encourage Ecology to consider modification of its regulations to specifically authorize the process using the language contained in the EPA regulations at 40 CFR 270.1c(4).

Even though progress was made at the meeting, much work remains to be done to reach resolution on several outstanding issues. Pursuant to the discussions during the meeting on Wednesday, August 29, 1990, DOE-RL has selected the following persons to work with EPA and Ecology personnel in a working group to attempt to resolve the several outstanding Hanford Permit issues: C. E. Clark - DOE-RL, J. E. Rasmussen - DOE-RL, R. M. Carosino - DOE-RL, S. E. Price - WHC, J. Bauer - WHC, and H. Tilden - PNL. C. E. Clark will have the lead for the DOE/Contractor group. It is our expectation that EPA and Ecology will identify individuals from your organizations to participate in this working group.



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Messrs. Day and Nord

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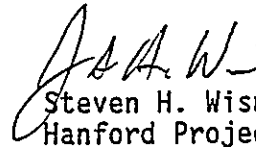
We suggest that an initial meeting of the working group be scheduled on October 9, 1990, at 1:00 p.m., in the Federal Building Room G-57 in Richland. We propose that at this first meeting discussion should focus on more clearly defining and prioritizing the outstanding issues to facilitate an early resolution. Subsequent meetings would focus on specific issues in the order of priority. We believe that the first issue to be resolved, before anything else, is a reasonable schedule for issuance of the permit. A schedule for the subsequent meetings should also be established at the first meeting.

We also suggest that as each issue is clearly defined, it be written down in a clear, concise statement to try to eliminate confusion over the issues and to assure that management is informed as to the issues under discussion. We suggest that DOE-RL will make arrangements to have minutes of the meetings taken and that after each meeting a summary of the meeting will be prepared which focuses on the key issue(s) discussed and decisions reached on resolution.

It is anticipated that it will take several weeks or longer to resolve some of the issues due to their complexity. Others are expected to be resolved quickly.

Please contact Mr. C. E. Clark (509-376-9333) in response to our proposal or if there are any questions.

Sincerely,


Steven H. Wisness
Hanford Project Manager

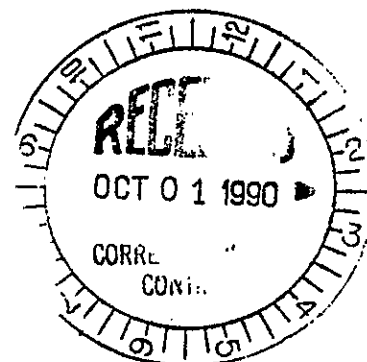
cc: D. L. Duncan, EPA
R. E. Lerch, WHC
S. M. Price, WHC
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